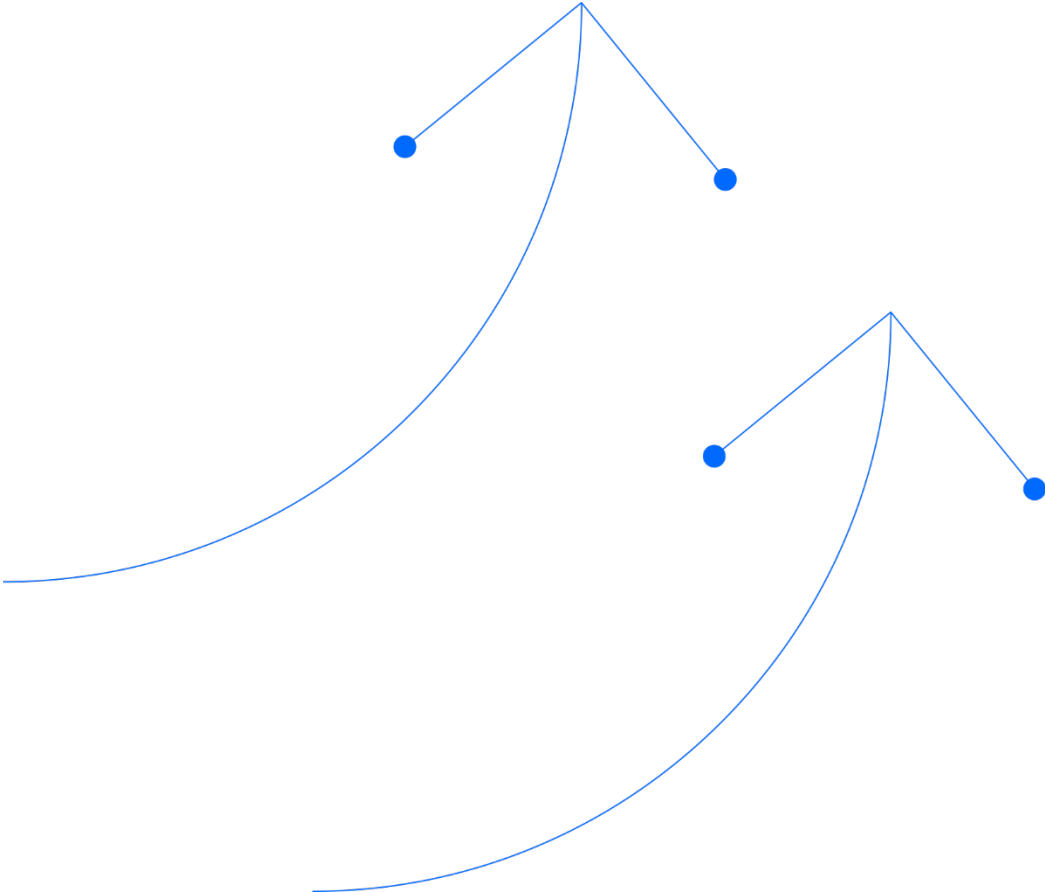


ANNUAL ENVIRONMENTAL PERFORMANCE REPORT 2024

McArthur Basin Hydraulic Fracturing Program



Document Title	Annual Environmental Performance Report 2024 McArthur Basin Hydraulic Fracturing Program
Environmental Management Plan covered	McArthur Basin Hydraulic Fracturing Program (STO 3-8) (Ref: NTEPA2021/0097-006~0001)
Permit	EP 161
Interest Holder Details	<p>Santos QNT Pty 60 Flinders Street, Adelaide South Australia 5000 GPO Box 2455, Adelaide South Australia 5001 ABN 33 083 077 96</p> <p>Tamboran Resources Ltd 110-112 The Corso, Manly NSW 2095 ABN 28 135 299 062</p>
Operator Details	<p>Santos QNT Pty, 60 Flinders Street, Adelaide South Australia 5000 GPO Box 2455, Adelaide South Australia 5001 ABN 33 083 077 96</p>
Approved by	Santos QNT Pty
Date Approved	19 December 2024

Signature and Certification

I/We hereby declare that the information provided in this annual environment performance report and accompanying documents is to the best of my/our knowledge, true and correct.

Asset / Project Approval

Signature

Name (print)

David Gornall

Position

Manager Environment EA PNG

Date

19 December 2024

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Abbreviations and Units

Acronym / Abbreviation	Description
AEPR	Annual Environmental Performance Report
ALARP	As low as reasonably practicable
Code	Code of Practice
DEPWS	Department of Environment, Parks and Water Security
DITT	Department of Industry, Tourism and Trade
EMP	Environmental Management Plan
EP	Exploration Permit
NT	Northern Territory
NT EPA	Northern Territory Environmental Protection Authority
Regulations	Petroleum (Environment) Regulations 2016

1. Introduction

The *Petroleum (Environment) Regulations 2016* (Regulations 2016) include a requirement for the interest holder to provide a report to the Minister on an annual basis that outlines the environmental performance of the interest holder on the approved Annual Environment Performance Report (AEPR).

Consistent with this Condition 2 of the McArthur Basin Hydraulic Fracturing Program EP 161 EMP STO3-8:

The interest holder must provide an annual report to DEPWS, via Onshoregas.DEPWS@nt.gov.au, on its environmental performance, in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT):

- i. the first report must cover the 12 month period from the date of the approval, and be provided within 3 calendar months of the end of the reporting period.*
- ii. the annual environment performance report must align with the template and Guideline prepared by DEPWS for this purpose and be provided each year until such time a notification is made to the Minister under regulation 14 that the activity is complete, or until the EMP is revised and re-approved.*

The report must include sufficient information to allow the Minister to assess whether the interest holder has met the environmental outcomes and environmental performance standards included in the approved Environmental Management Plan (EMP). The report is to consider information required to be recorded, monitored, or reported under the Regulations 2016 and any other law in force in the Northern Territory related to conduct of the regulated activity.

This AEPR applies to the McArthur Basin Hydraulic Fracturing Program EMP STO3-8 that was approved on 6 October 2021.

The period covered by this AEPR is from 6 October 2023 until 5 October 2024.

1.1. Background

Santos QNT Pty Ltd (Santos) submitted the McArthur Basin Hydraulic Fracturing Program EP 161 EMP (STO3-8) (hereafter referred to as the ‘EMP’) under the *Petroleum (Environment) Regulations 2016* that came into force 11 June 2019. The EMP was submitted for Tanumbirini (Tanumbirini 1 (previously commenced), Tanumbirini 2H and Tanumbirini-3H), and the Inacumba (Inacumba-1/1H, Inacumba-2H) locations.

The EMP was approved on 6 October 2021 for the Tanumbirini location only. Santos submitted a modification notice 23 December 2023 to update the onsite monitoring requirements. The modification reflected the reduced operational activity and associated reduced risk on the Tanumbirini well.

This AEPR has been prepared to report on regulated activities that have occurred under the EMP between 6 October 2023 until 5 October 2024. Decommissioning of the tanks between October 2023 and February 2024 were the only regulated activities that were undertaken in the 2023-2024 reporting period.

1.2. Contents of Performance Report

This AEPR describes the environmental performance of Santos by evaluation of the following:

- Compliance with Ministerial approval conditions for the EMP.
- Compliance with each environmental outcome and environmental performance standard within the approved EMP.
- Compliance with reporting requirements in accordance with the Code of Practice: Onshore Petroleum Activities in the Northern Territory 2019 (the Code) and the Regulations 2016.
- All recordable and reportable incidents, including root cause analysis and related corrective actions to prevent re-occurrence.
- Findings of all regulatory inspections and audits and related actions to address any findings.

1.3. Assessment of Compliance

Table 1 shows the compliance status indicators used in this AEPR.

Table 1: Compliance descriptors

Indicator	Description
Compliant	Compliant with requirement for the reporting period
Not Compliant	Not compliant with the requirement during the reporting period
Not Applicable	Requirement not applicable during the reporting period

1.4. Evidence of Compliance

The following sources of evidence are used to demonstrate compliance:

- Internal monitoring of compliance by Santos through internal audits of compliance and reporting including incident reporting.
- Outcomes from regulator inspections conducted by the Department of Environment, Parks and Water Security (DEPWS) (Petroleum Operations Branch).
- Recordable and reportable incident reports submitted to DEPWS Petroleum Operations
- Reports provided to DEPWS, the Department of Industry Tourism and Trade (DITT) and other government agencies.

2. Demonstration of Compliance

Table 2 demonstrates Santos’s compliance with Ministerial EMP approval conditions.

Table 2: Compliance with ministerial EMP approval conditions from 6 October 2023 until 5 October 2024.

Item No.	Ministerial Condition	Compliance Status	Evidence
1.	<p><u>Condition 1:</u> The interest holder must submit to the Department of Environment, Parks and Water Security (DEPWS), via Onshoregas.DEPWS@nt.gov.au the following:</p> <ul style="list-style-type: none"> i. an updated timetable for the regulated activity that is to be provided on the last day of each quarter (being 31 March, 30 June, 30 September and 31 December each year), that identifies activities completed in the current quarter. ii. notification of the commencement of hydraulic fracturing activities prior to commencement including notification of the installed enclosed wastewater tank volumes at Tanumbirini and Inacumba well sites. iii. during hydraulic fracturing, flowback and if wastewater is present in tanks, weekly reports indicating: <ul style="list-style-type: none"> • status and progress of hydraulic fracturing. • weekly measurement of stored volume (in ML) and freeboard available (in cm) of wastewater storage tanks, unless operated in the wet season, during which it must be measured and reported daily. • the outcome of general site inspections relevant to hydraulic fracturing and waste, and corrective actions taken. 	Compliant	<p>Updated timetables for regulated activities were provided throughout the reporting period.</p> <p>Decommissioning of the flowback tanks occurred between October 2023 to February 2024. There was no undertaking or commencement of any other hydraulic activities (inclusive of hydraulic fracturing and flowback) in the reporting period.</p>

	<ul style="list-style-type: none"> any halt to the regulated activity due to wet season conditions any fires potentially threatening the activity from external or internal sources. 		
2.	<p><u>Condition 2:</u></p> <p>The interest holder must provide an annual report to DEPWS, via Onshoregas.DEPWS@nt.gov.au, on its environmental performance, in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016 (NT):</p> <ul style="list-style-type: none"> i. the first report must cover the 12 month period from the date of the approval, and be provided within 3 calendar months of the end of the reporting period. ii. the annual environment performance report must align with the template and Guideline prepared by DEPWS for this purpose and be provided each year until such time a notification is made to the Minister under regulation 14 that the activity is complete, or until the EMP is revised and re-approved. 	Compliant	This Annual Environmental Performance Report.
3.	<p><u>Condition 3:</u></p> <p>In support of clause D.6.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, an emissions report must be provided to DEPWS by 30 September each year, via Onshoregas.DEPWS@nt.gov.au, which summarises actual annual greenhouse gas emissions reported under the Commonwealth National Greenhouse and Energy Reporting Act 2007 versus predicted emissions in the EMP. The emissions report should include:</p> <ul style="list-style-type: none"> i. a summary of regulated activities conducted which have contributed to greenhouse gas emissions. ii. explanation of differences between actual and predicted emissions with reference to all parts of the regulated activity with potential to create greenhouse gas emissions. 	Compliant	The emissions report was provided to DEPWS on 30 September 2024.

<p>4.</p>	<p>To support clause C.7.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, all accidental releases of liquid contaminant or hazardous chemical must be recorded in a spill register as soon as practicable. The spill register and geospatial files specifying the location of the spill must be submitted to DEPWS via Onshoregas.DEPWS@nt.gov.au with the Annual Environment Performance Report each year while the EMP is in force. The register must include:</p> <ul style="list-style-type: none"> i. the location source and volume of the spill ii. volume of impacted soil removed for appropriate disposal and the depth of any associated excavation iii. the corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature iv. GPS coordinates of the location of the spill. 	<p>Not Applicable</p>	<p>No accidental releases of liquid contaminant or hazardous chemical occurred within the reporting period.</p>
<p>5.</p>	<p><u>Condition 5:</u></p> <p>In support of clause B.4.17.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, the interest holder must:</p> <ul style="list-style-type: none"> i. undertake quarterly groundwater monitoring at each control and impact monitoring bore for a minimum of three years after establishment, unless otherwise advised by DEPWS. ii. provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, the results of quarterly groundwater monitoring, as soon as practicable and no later than 2 months after collection, in a format to be determined by DEPWS. iii. provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au, an interpretative report of groundwater quality based on the groundwater monitoring required to be conducted at the well site(s) in accordance with Table 6 of the Code. The 	<p>Not Compliant</p>	<ul style="list-style-type: none"> i. Quarterly groundwater monitoring reports were undertaken for Q4 2023, Q2 2024 and Q3 2024. Groundwater sampling scheduled for Q1 2024 was unable to be conducted due to landholder advice restricting access as a result of wet weather conditions. This was communicated to DEPWS on 28 March 2024. ii. The following quarterly groundwater monitoring reports were provided to DEPWS by email: <ul style="list-style-type: none"> • Q4 2023 – 11 December 2024 • Q2 2024 – 26 July 2024 • Q3 2024 – 15 November 2024 <p>Groundwater sampling scheduled for Q1 2024 was unable to be conducted due to landholder advice restricting access as a result of wet weather conditions. This was communicated to DEPWS on 28 March 2024.</p> <ul style="list-style-type: none"> iii. An interpretative groundwater quality report was conducted and provided to DEPWS on 14 December 2023 and 23 December 2022.

	<p>interpretative report must be provided annually within 3 months of the anniversary of the approval date of the EMP and include:</p> <ul style="list-style-type: none"> • identification of any change to groundwater quality or level attributable to conduct of the regulated activity at the well site(s) and discussion of the significance and cause of any such observed change • interpretation of any statistical outliers observed from baseline measured values for each of the analytes • discussion of any trends observed • a summary of the results including descriptive statistics • description of the layout of the groundwater monitoring bores and wells, indicative groundwater flow directions and levels in accordance with the <i>Preliminary Guideline Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-basin</i>. <p>iv. develop site-specific performance standards for groundwater quality and interquartile ranges for analytes at each of the impact monitoring bore established, based on the first 3 years of groundwater monitoring, and provide to DEPWS, via Onshoregas.DEPWS@nt.gov.au within 6 months of the 3 year anniversary of approval of the EMP.</p>		<p>iv. Santos has commenced the development of site-specific performance standards for groundwater quality. These will be provided to the Department within the timeframe specified in Condition 5(iv).</p>
<p>6.</p>	<p><u>Condition 6:</u></p> <p>In support of clause 16 of the Water Act 1992 (NT) and clause B.4.2 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory, the interest holder must undertake groundwater level/pressure monitoring at each impact monitoring bore established, using a logger to record water level for 2 weeks prior to, during, and 4 weeks after completion of hydraulic fracturing operations at each well pad. Data logging should record</p>	<p>Not Applicable</p>	<p>No stimulation activities occurred in the reporting period.</p> <p>The last set of stimulation activities were complete December 2021 with the groundwater level / pressure data provided to DEPWS 31 January 2022.</p>

	at a minimum of every 4 minutes for the duration of the recording period. The logging data should be provided to DEPWS via Onshoregas.DEPWS@nt.gov.au within 2 weeks of completion of groundwater level monitoring in each impact monitoring bore.		
7.	<p>The interest holder must provide to DEPWS within 6 weeks of completion of well flowback operations at each new exploration well established under the EMP a report on the risk assessment of flowback wastewater from the hydraulic fracturing phase, via Onshoregas.DEPWS@nt.gov.au. The risk assessment must be:</p> <ul style="list-style-type: none"> i. prepared by a suitably qualified person ii. prepared in accordance with the monitoring wastewater analytes specified in section C.8 of the Code of Practice: Onshore Petroleum Activities in the Northern Territory. 	Not Applicable	No well flowback operations were undertaken within the reporting period.
8.	The interest holder must provide fortnightly, via Onshoregas.DEPWS@nt.gov.au, forecast weather and forecast bushfire danger for the duration of the regulated activity.	Not Applicable	No regulated activities were undertaken during the reporting period.
9.	In addition to the methane leak detection requirements of Section D.5.2 and Table 10 of the Code, the Interest Holder must also undertake leak detection and reporting (LOAR) within seven days of commissioning the well.	Not Applicable	No wells were commissioned during the reporting period.

Table 3 provides a systematic overview of Santos’s compliance with the environmental outcomes and environmental performance standards within the approved EMP.

Table 3: Compliance with Environmental Outcomes and Environmental Performance Standards

Item No.	Environmental Outcome	Environmental Performance Standard	Compliance Status	Evidence
1.	No significant impact to threatened flora or fauna species, their habitat or sites of conservation significance resulting from conduct of the regulated activity.	<ul style="list-style-type: none"> Avoid impacts to threatened flora or fauna species, their habitat or sites of conservation significance. Avoid dust associated impacts to threatened flora or fauna species, their habitat or sites of conservation. No introduction of new species of weeds or plant pathogens, or increase in abundance of existing weed species, as a result the regulated activity. No uncontrolled fire in EP161 as a result of conduct of the regulated activity. No releases of wastes, wastewater, chemicals or hydrocarbons resulting in significant impact to threatened flora or fauna species, their habitat or sites of conservation significance. 	Compliant	<ul style="list-style-type: none"> Site induction records show all personnel have completed site inductions, which includes requirements for managing impacts to terrestrial fauna. There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks. Verification report shows all domestic waste receptacles have lids secured when on site. Verification report shows inspection of fences, excavations, pits, storages for entrapped fauna and fauna escapes intact. Verification report shows assessment of fire weather during dry season, and all site personnel notified of fire risk. The post-wet annual weed monitoring was undertaken between 28 and 30 May 2024 by a suitably qualified professional.
2.	No significant impact to the quality and integrity of land and soils resulting from conduct of the regulated activity.	<ul style="list-style-type: none"> No unauthorised physical disturbance to soil. Weekly inspection checklists confirm all hazardous materials are stored and managed in accordance with the EMP, the Code of practice and the Well Operations Management Plan (WOMP) e.g. chemicals will be stored in a bunded dangerous goods storage area, routine inspection of chemical stores. 	Compliant	<ul style="list-style-type: none"> Site induction records show all personnel have completed site inductions, which includes requirements for managing impacts to land and soil. There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks.

3.	No impact on inland environmental water quality resulting from conduct of the regulated activity.	<ul style="list-style-type: none"> • No releases of wastes, wastewater, chemicals, hydrocarbons resulting in contamination of the waters. • No reduction to groundwater resource availability in the area as a result of the regulated activity. 	Compliant	<ul style="list-style-type: none"> • Records show wastewater stored in lined tanks. • Records of freeboard provided. • Spill register maintained. • Verification reports confirm no releases resulting in contamination of waters.
4.	No significant impact on air quality and minimise greenhouse gas emissions as a result of the regulated activity.	<ul style="list-style-type: none"> • Minimise greenhouse gas emissions as a result of the regulated activity. 	Compliant	<ul style="list-style-type: none"> • The Annual Emissions Report 2024 provided to DEPWS on 30 September 2024.
5.	No reduction in amenity or impact on the respiratory health of nearby stakeholders as a result of the regulated activity.	<ul style="list-style-type: none"> • Dust generation on the well pad and access tracks in the dry season will be minimised. 	Compliant	<ul style="list-style-type: none"> • Site induction records show all personnel have completed site inductions. • There were no incidents in the Incident Management System relating to speed limits or driving off permitted access tracks. • Stakeholder engagement records show no complaints were received regarding dust.
6.	Minimise negative impact to communities and enhance the economy as a result of the regulated activity.	<ul style="list-style-type: none"> • Noise complaints from vehicle movements and activities associated with the regulated activity are minimised. • Disturbance, injury or death to livestock from vehicle movements and project activities avoided through active stakeholder engagement. • Disturbance to landholders from vehicle movements and HFS activities minimised. 	Compliant	<ul style="list-style-type: none"> • Site induction records show all personnel have completed site inductions. • Records show fences are intact, gates are left in the condition in which they were found and no livestock entrapment. • Stakeholder engagement records show notification prior to the commencement of activities. • Stakeholder engagement records show no complaints were received regarding dust.

7.	Vehicle and plant movements throughout the project area results in disturbance to sacred sites.	<ul style="list-style-type: none"> No impact to sacred sites, culture and heritage as a result of project activities. 	Compliant	<ul style="list-style-type: none"> No non-compliance with restricted work areas, sacred sites AAPA certificate conditions or impacts to known archaeological sites were recorded. There were no records in the Incident Management System for incidents relating to driving off permitted access tracks. The GIS database is maintained throughout the year that includes project areas and cultural heritage sites.
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Table 4 demonstrates Santos’s compliance with reporting requirements in the *Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code of Practice)* and the *Petroleum (Environment) Regulations 2016 (NT)*.

Table 4: Compliance with mandatory reporting requirements for Code of Practice and Petroleum (Environment) Regulations 2016.

Item No.	Reference	Requirement	Compliance Status	Evidence
1.	Code cl A.3.5	Geospatial information depicting areas cleared is to be provided to the Minister.	Not Applicable	No clearing was undertaken during the reporting period.
2.	Code cl A.3.6 (b)	Weed management plan developed as part of the EMP must provide for ongoing weed monitoring.	Compliant	Weed Management plan developed and attached to the EMP was endorsed by DEPWS (Appendix E of approved EMP) contains monitoring requirements. This plan was complied with during the reporting period. The post-wet annual weed monitoring was undertaken between 28 and 30 May 2024 by a suitably qualified professional.
3.	Code cl A.3.7(a)vi	The fire management plan developed as part of the EMP must provide for annual fire mapping to monitor changes to fire frequency in the relevant areas.	Compliant	Fire management plan, section 7.2 of approved EMP makes provision for this requirement of the Code of Practice. In accordance with the fire management plan if a fire has occurred in and around the project footprint, Santos in consultation with the pastoralist and with the pastoralist’s approval endeavour to map the extent of the fire and provide that information to DEPWS. There were no fires in and around the project footprint during the reporting period.
4.	Code cl A.3.9(c) Code cl A.3.9(e)	The rehabilitation plan developed as part of the EMP requires progressive rehabilitation of significantly disturbed land which is required to commence no longer than 12 months following the cessation of activities on the land. It also requires regular maintenance and annual monitoring of rehabilitated areas.	Not Applicable	The EMP was revised to clarify and provide certainty that no clearing will be undertaken. No rehabilitation will be required as a result of activities undertaken in accordance with this EMP.

5.	Code cl B.4.13.2(c)	As a minimum, the following must be recorded and reported for each stage (where a stage in this context means all fluids pumped at a particular depth interval): a) total volume of hydraulic fracturing fluid pumped, b) quality of water used (tested for analytes in section C.8 of this Code. Analyses do not need to be repeated if the same water source is used for multiple stages) and c) typical and maximum concentrations of chemicals or other substances used.	Not Applicable	No regulated activities occurred in the reporting period.
6.	Code cl B.4.13.2(k)iv	Where venting is the only technically feasible option for managing produced gas, the technical considerations preventing the use of the recovered gas must be recorded and included in the operator's annual report.	Not Applicable	No regulated activities occurred in the reporting period.
7.	Code cl B.4.14.2(c)	All new barriers or new well operating envelopes must be verified and clearly documented and reported by submission of an updated well barrier integrity validation (WBIV) report to DPIR.	Not Applicable	No regulated activities occurred in the reporting period.
8.	Code cl B.4.15.2(j)	Complete and accurate records of the entire decommissioning procedure must be kept, with these records submitted as part of the legislative reporting requirements for the decommissioning of petroleum wells.	Not Applicable	No regulated activities occurred in the reporting period.
9.	Code cl B.4.17.2(d)	Any guidelines published by the Northern Territory Government from time to time relating to reporting and data submission, and groundwater monitoring data standards must be followed.	Compliant	Reporting and data submission, and groundwater monitoring data standards were in accordance with <i>Preliminary Guideline: Groundwater Monitoring Bores for Exploration Petroleum Wells in the Beetaloo Sub-basin.</i>

10.	Code cl C.3(e)	The components of the wastewater management framework, include: Monitor, manage and report in accordance with the Wastewater Management Plan and Spill Management Plan.	Compliant	The wastewater management plan, Appendix G and spill management plan Appendix H, of the EMP 2021 makes provision for this requirement of the code. Verification reports provided to DEPWS provide outcomes of the routine inspections on wastewater tanks, secondary containment and wastewater storage levels and volumes implemented onsite.
11.	Code cl C.6.1(d)	Wastewater tracking documentation must be reported to the Minister at least annually in accordance with the framework (Spill Management Plan and Wastewater Management Plan) outlined in the EMP	Not Applicable	No regulated activities occurred in the reporting period.
12.	Code cl C.7.1(d)ii	Wastewater Management Plan must include a program for monitoring and reporting against the effectiveness of the measures for the mitigation of interaction with wildlife, stock and human receptors with wastewater.	Compliant	The Wastewater Management Plan, Appendix G of the approved EMP makes provision for this requirement of the code.
13.	Code cl D.4.3.2(f)	A written report detailing the levels of methane measured, the duration of the unusual readings and the results of the investigation (including remedial actions) must be submitted within one month of the significantly higher-level methane event being detected.	Not Applicable	No regulated activities occurred in the reporting period.
14.	Code cl D.5.9.2(c)	Emissions from exploration, well construction (including during flowback) and workovers must be measured and reports submitted.	Compliant	The Annual Emissions Report 2024 provided to DEPWS on 30 September 2024.
15.	Code cl D.5.9.3(a)	Where natural gas is vented or flared at a gas processing or other downstream facility, emissions must be estimated and reported.	Not Applicable	The regulated activity did not include a gas processing or downstream facility.
16.	Code cl D.6.1	All mandated government reporting is complied with; and all detectable leaks and emissions are reported on an annual basis.	Compliant	The Annual Emissions Report 2024 provided to DEPWS on 30 September 2024. Reporting under the Code cl D.6.1 was not required in the reporting period.

17.	Code cl D.6.2(a)	Reports of baseline assessments must be submitted at the conclusion of each field campaign.	Compliant	Baseline assessment reports have been submitted in the form of groundwater monitoring reports, and weed management plans appended to the approved EMP.
18.	Code cl D.6.2(b)	Emissions reporting must be in accordance with Section D.5.6. Emissions associated with venting and flaring as described in Section D.5.9 must be provided separately to the Northern Territory Government in accordance with this Code.	Compliant	The Annual Emissions Report 2024 provided to DEPWS on 30 September 2024.
19.	Regulation 14	A current EMP remains in force until the interest holder notifies the Minister the activity is no longer being carried out and all of the environmental outcomes and obligations under the plan have been met, and the Minister advises the interest holder the notice is accepted and the plan ceases to be in force.	Compliant	The current EMP remains in force.
20.	Regulations Schedule 1, item 9(2)	Interest holders are required to conduct future engagement with stakeholders, in accordance with the description in the EMP.	Compliant	Stakeholder engagement logs indicate that engagement with stakeholders has been ongoing where applicable.
21.	Regulations Schedule 1, item 12	Interest holder must notify the Minister, occupier of the land and owner of the land on which the activity is to be carried out before commencement of activity.	Not Applicable	No activities commenced in the reporting period.
22.	EMP Section 8.8 Incident Reporting Regulation 33	DEPWS is notified of reportable incidents within 2 hours of the interest holder becoming aware of the incident, or within 2 hours of the incident occurring. A written report must be provided within 24 hours if the initial report was made orally.	Not Applicable	There were no reportable incidents during the reporting period.
23.	EMP Section 8.8 Incident Reporting Regulation 34	Reports on reportable incidents are to be provided to DENR as soon as practicable and within 72 hours of the event occurring.	Not Applicable	There were no reportable incidents during the reporting period.

		A final report must be provided to DLPE within 30 days after remediation/cleanup of the affected area.		
24.	EMP Section 8.8 Incident Reporting Regulation 35	A written report of all recordable incidents must be provided to DLPE not later than 15 days after the 90-day reporting period (unless otherwise agreed).	Compliant	<p>A recordable incident was reported on 15/01/2024 (Ref: NTEPA2021/0097-006~0001) for the October 2023 – December 2023 reporting period regarding freeboard levels at the Tanumbirini Water Storage tank. During staged decommissioning the freeboard levels exceeded the minimum required in the EMP due to the removal of the top section of the tank. By 25 December 2023, the fluid levels were restored to below the minimum freeboard.</p> <p>The impact on the environment was negligible as the exceedances were minor and did not result in any release to the environment.</p>
25.	Regulation 37 (1)	A copy of prescribed records is to made available to DEPWS upon direction of the Minister or inspector.	Compliant	<p>DEPWS requested prescribed records associated with the disposal of waste, namely the final destination of tank liners, on 9 July 2024. Santos provided responses to the request on 23 July 2024 and DEPWS requested further clarification of information relating to Santos submitted prescribed records for wastewater and liner removal on 15 August 2024. Santos responded by providing DEPWS with further clarification on wastewater and liner removal details on 30 August 2024.</p>
26.	Regulation 37A	A report about flowback fluid from hydraulic fracturing must be provided to the Minister within 6 months of the flowback occurring.	Not Applicable	No regulated activities occurred in the reporting period.
27.	Regulation 37B	A report about produced water from hydraulic fracturing must be provided to the Minister within 6 months of the produced water being extracted.	Not Applicable	No regulated activities occurred in the reporting period.
28.	<i>Environment Protection Act 2019</i> (NT) div 8	Duty to notify the NT EPA as soon as practicable but within 24 hours of any incident which occurs which causes or threatens to cause material or significant environmental harm	Not Applicable	No incidents which could cause or threaten to cause material or significant environmental harm occurred during reporting period.
29.	<i>Waste Management and</i>	Duty to notify the NT EPA as soon as practicable but within 24 hours of any	Not Applicable	No incidents which could cause or threaten to cause material or significant environmental harm occurred during reporting period.

	<i>Pollution Control Act 1998</i> (NT) s14	incident which occurs which causes or threatens to cause pollution resulting in material or significant environmental harm.		
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3. Summary of Compliance

3.1. Overview of Compliance

Table 5 provides a summary of the results of the compliance assessment against the 44 total compliance items.

Table 5: Compliance Summary

Compliance Indicator	Number	Percentage
Compliant	23	51%
Not Compliant	1	2%
Not Applicable	21	47%

3.2. Overview of items found Not Compliant or Partially Compliant

The following sections describe the any compliance requirements not met or partially met during the reporting period.

3.2.1. Ministerial Approval Conditions

A potential non-compliance was reported for Condition 5(i) regarding groundwater sampling requirements for Q1 2024. Attempts to conduct sampling with a suitably qualified professional at the start and end of Q1 2024 were unsuccessful due to heavy rainfall exceeding 700 mm and associated site access restrictions enforced by the landholder.

Email correspondence regarding Q1 sampling efforts has been provided to DEPWS, and Santos acknowledges DEPWS's correspondence in May 2024 regarding industry-wide groundwater sampling findings. Santos is addressing wet season sampling constraints and access challenges to ensure future compliance while adhering to landholder restrictions and safety requirements.

3.2.2. Environmental Performance Standards

Not applicable – compliant with environmental performance standards.

3.2.3. Regulatory Reporting Standards

Not applicable – compliant with regulatory reporting standards.